

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

**FEE STATEMENT COVER SHEET FOR THE
PERIOD JULY 1, 2023 THROUGH AUGUST 11, 2023**

Debtor: LTL Management LLC	Name of Applicant: Weil, Gotshal & Manges LLP
Case No.: 23-12825 (MBK)	Client: Special Counsel to LTL Management LLC
Chapter: 11	Case Filed: April 4, 2023 (the “ Petition Date ”)

**SECTION I
FEE SUMMARY**

<input checked="" type="checkbox"/> Interim Fee Application No. <u>2</u>	<input type="checkbox"/> Final Fee Application
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Summary of Amounts Requested for the Period July 1, 2023 through August 11, 2023 (the “**Fee Period**”).

Total Fees for the LTL Debtor:	<u>\$29,735.75</u>
Total Disbursements:	<u>\$381.51</u>
Total Fees Plus Disbursements:	<u>\$30,117.26</u>
Minus 20% Holdback:	<u>\$5,947.15</u>
Amount Sought at this Time:	<u>\$24,170.11</u>

Summary of Amounts Requested for Previous Periods:

	Fees	Expenses
Total Previously Requested:	<u>\$168,715.50</u>	<u>\$262.77</u>
Total Allowed to Date:	<u>\$0.00</u>	<u>\$0.00</u>
Remaining Holdback (If Applicable):	<u>\$33,743.10</u>	<u>\$0.00</u>
Total Received By Applicant:	<u>\$0.00</u>	<u>\$0.00</u>

**COMPENSATION BY PROFESSIONAL
JULY 1, 2023 THROUGH AUGUST 11, 2023**

The attorneys who rendered professional services in this chapter 11 case during the Fee Period are:

NAME OF PROFESSIONAL: PARTNERS AND COUNSEL	DEPARTMENT[†]	YEAR ADMITTED	HOURLY RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Sullivan, Diane P.	LIT	1987	\$1,550.00	6.90	\$10,695.00
Tsekerides, Theodore E.	LIT	1994	\$1,550.00	4.30	\$6,665.00
Berkovich, Ronit J.	RES	2002	\$1,550.00	4.70	\$7,285.00
Goren, Matthew	RES	2007	\$1,300.00	3.80	\$4,940.00
Total Partners and Counsel:				19.70	\$29,585.00

NAME OF PROFESSIONAL: ASSOCIATES	DEPARTMENT[†]	YEAR ADMITTED	HOURLY RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Friedman, Julie T.	RES	2003	\$775.00	2.20	\$1,705.00
George, Jason	RES	2019	\$970.00	5.10	\$4,947.00
Dobbs, Ashlynn	RES	2023	\$605.00	22.60	\$13,673.00
Total Associates:				29.90	\$20,325.00

[†] RES – Restructuring; LIT – Litigation

The paraprofessionals who rendered professional services in this chapter 11 case during the Fee Period are:

NAME OF PARAPROFESSIONALS:	DEPARTMENT [‡]	HOURLY RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Fabsik, Paul	RES	\$395.00	6.90	\$2,725.50
Total Paraprofessionals:			6.90	\$2,725.50

The total fees for the Fee Period are:

PROFESSIONALS	BLENDED RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
TOTALS:			
Partners and Counsel:	\$1,501.78	19.70	\$29,585.00
Associates:	\$679.77	29.90	\$20,325.00
Paraprofessionals	\$395.00	6.90	\$2,725.50
Blended Attorney Rate:	\$1,006.25		
Blended Rate for All Timekeepers:	\$931.60		
Total Fees Incurred:			\$52,635.50

[‡] RES – Restructuring

**SECTION II
SUMMARY OF SERVICES**

**COMPENSATION BY WORK TASK CODE FOR
SERVICES RENDERED BY WEIL, GOTSHAL & MANGES LLP
FOR THE PERIOD JULY 1, 2023 THROUGH AUGUST 11, 2023**

TASK CODE	DESCRIPTION	HOURS	AMOUNT	LTL %	LTL PORTION
L120	Strategy	40.90	\$43,128.00	50%	\$21,564.00
L320	Document Collection & Production	5.20	\$2,054.00	50%	\$1,027.00
L450	Court Conferences & Hearings	0.90	\$617.50	50%	\$308.75
L602	Weil Retention/Fee Application Preparation	9.50	\$6,836.00	100%	\$6,836.00
Total Fees Requested:		56.50	\$52,635.50		\$29,735.75

**SECTION III
SUMMARY OF DISBURSEMENTS**

**DISBURSEMENT SUMMARY BY WEIL, GOTSHAL & MANGES LLP
FOR THE PERIOD JULY 1, 2023 THROUGH AUGUST 11, 2023**

DISBURSEMENTS	AMOUNTS	LTL %	LTL PORTION
Court Reporting	\$420.50	50%	\$210.25
Online News Monitoring	\$340.00	50%	\$170.00
Printing – B&W	\$2.52	50%	\$1.26
Total Disbursements Requested:	\$763.02		\$381.51

SECTION IV CASE HISTORY

- | | |
|--|---|
| (1) Date case filed: | April 4, 2023 |
| (2) Chapter under which case commenced: | Chapter 11 |
| (3) Date of retention: | June 14, 2023 <i>nunc pro tunc</i> to April 4, 2023 [Dkt. 780] (the “ Retention Order ”). ¹ |
| (4) Summarize in brief the benefits to the estate and attach supplements as needed | SEE BELOW |

During the Fee Period, Weil, Gotshal & Manges LLP (“**Weil**”) provided the following services to LTL Management LLC (the “**Debtor**”) including, but not limited to, the following:

Strategy

- Monitored dockets of the chapter 11 cases of *Imerys Talc America, Inc., et al.*, Case No. 19-10289 (LSS), (Bankr. D. Del.) (the “**Imerys Bankruptcy Cases**”), *In re Cyprus Mines Corporation*, Case No. 21-10398 (LSS), (Bankr. D. Del.) (the “**Cyprus Bankruptcy Case**,” and together with Imerys Bankruptcy Cases, “**Imerys/Cyprus Bankruptcy Cases**”), and the Debtor’s bankruptcy case, reviewed relevant pleadings filed and orders issued therein to assess any potential impact on the Debtor and its strategy relating to the Imerys/Cyprus Bankruptcy Cases and to protect the Debtor’s interests in the Imerys/Cyprus Bankruptcy Cases, and prepared updates to the Debtor regarding same.
- Analyzed and reviewed provisions of the Debtor’s proposed amended chapter 11 plan relevant to Imerys/Cyprus Bankruptcy Cases and strategies.
- Participated in internal team conferences and client conferences regarding strategies and workstreams in Imerys/Cyprus Bankruptcy Cases.

Document Collection & Production

- Prepared daily docket summaries of filings in the Imerys/Cyprus Bankruptcy Cases and Debtor’s bankruptcy case.

Weil Retention / Fee Application Preparation

- Prepared monthly fee statement.

¹ The Retention Order entered on June 14, 2023 [Dkt. 780] is attached hereto as **Exhibit A**.

(5) Anticipated distribution to creditors:	
(a) Administration expense:	Unknown at this time.
(b) Secured creditors:	Unknown at this time.
(c) Priority creditors:	Unknown at this time.
(d) General unsecured creditors:	Unknown at this time.
(6) Final disposition of case and percentage of dividend paid to creditors:	Final dividend percentages are unknown at this time.

I certify under penalty of perjury that the above is true.

Date: September 7, 2023

/s/ Ronit J. Berkovich

Ronit J. Berkovich